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**EXHIBIT 4**

Jason Barrat; AZ Bar No. 029086  
James Weiler; AZ Bar No. 034371  
Kelsey Whalen; AZ Bar No. 037043  
Jessica Miller; AZ Bar No. 031005

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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT**

**DISTRICT OF ARIZONA**

**Jason Fritch**, an Arizona resident;  
  
Plaintiff,

v.

**Orion Manufactured Housing  
Specialists, Inc.**, an Arizona company;  
and **L. James Miller**, an Arizona resident;  
  
Defendants.

**Case No. 4:21-cv-00509-JGZ-JR**

**DECLARATION OF JESSICA MILLER**

**(Assigned to the Hon. Jennifer G. Zipps)**

1. I am counsel of record for Plaintiff Jason Fritch in the above-entitled action.  
I have been involved in this case since I was re-hired by Weiler Law (formally Zoldan Law Group) in February 2023.

2. I submit this Declaration in support of Plaintiff's Motion for Award of Attorneys' Fees.

3. I have been a member in good standing of the State Bar of Arizona for about

1 nine and-a-half years, since being admitted to the bar in February 2014. During my entire  
2 tenure as a litigator my practice has been devoted to plaintiff's employment law, including  
3 wage and hour claims. I have litigated approximately one hundred lawsuits for employees  
4 during this time frame. The overwhelming majority of my cases are on a contingency or  
5 partial contingency basis.

7 4. I attended the University of Texas in Austin, Texas for undergrad from 2002-  
8 2006, and successfully earned my bachelor's degree in Government with a minor in the  
9 German language. In 2013, I graduated *magna cum laude* from Sandra Day O'Connor  
10 College of Law. While enrolled in law school, I won four CALI awards, I was a Committee  
11 Chair on the Arizona State Law Journal, and I was appointed a William Pedrick Scholar  
12 for every semester I attended ASU. I passed the Arizona bar in 2013 and was licensed to  
13 practice law in February 2014.

16 5. I began practicing employment law and have represented numerous  
17 employment litigation plaintiffs in both Superior Court and the Federal Court for the  
18 District of Arizona. I was licensed to practice in the United States Court of Appeals for  
19 the Ninth Circuit in March 2017.

21 6. I acted as co-counsel for this matter. As co-counsel, I was responsible for  
22 assisting in developing case strategy, making impactful decisions regarding the direction  
23 of the litigation, conduct research and draft motions.

25 7. I have not received any payment for accrued attorneys' fees or costs.  
26 Although the Plaintiff in this case was never obligated to pay an hourly rate, my hourly  
27 rate is \$400 per hour. This hourly rate is commensurate with my experience level, and is  
28 well within the standard hourly rates charged by other law firms in the Phoenix

1 Metropolitan Area, particularly given the skill level and time commitment required to  
2 successfully litigate a FLSA lawsuit.

3  
4 8. All attorneys at my firm maintain detailed daily time records on behalf of our  
5 clients. Such time is recorded in 1/10<sup>th</sup> of an hour increments. Each time record is  
6 maintained on the firm's computers, the firm's network, and then is backed-up online. All  
7 fee records are prepared contemporaneously with the time or expense that is being billed.

8  
9 9. I have personally rendered all of the services reflected in the Billing  
10 Summaries under the initial "JM" (attached hereto as "**Exhibit 5**"). Those Billing  
11 Summaries reflect the date that the service was rendered; a description of the work actually  
12 performed; and the amount of time expended (in tenths of an hour).

13  
14 10. As reflected in the summaries and **Exhibit 5**, my legal fees incurred in this  
15 case total 45.3 hours at \$400 per hour to equal \$18,120.

16  
17 11. Some of the entries included in **Exhibit 5** contain general descriptions of the  
18 work performed and were prepared for the purpose of protecting attorney-client  
19 communications.

20  
21 12. During the course of my firm's representation of Plaintiff, I have exercised  
22 billing judgment by striking items from this fee request that are duplicative, if any, or other  
23 time for which the firm would not expect to be compensated.

24  
25 13. In light of the foregoing, I request that the Court award my attorneys' fees in  
26 the amount of **\$18,120**.

27  
28 14. I declare under penalty of perjury that the foregoing is true and correct.

RESPECTFULLY SUBMITTED August 1, 2023.

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**WEILER LAW PLLC**

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